

REMARKS*Status of the Specification*

Examiner has requested that the status of all parent priority applications and all citations to other US filed applications be updated. These status updates have been provided in the amendments to the specification.

The specification stands objected to because of certain use of hyperlinks. By present amendments to the specification, all hyperlinks have been deleted in favor of equivalent descriptive language.

Modifications to recitations of trademarks are said by Examiner to be required. By present amendment to the specification, Examiner's directions have been adopted for trademark usage.

Certain references cited by applicant as background material have been identified by Examiner as not in proper order if they are to be considered for prior art patentability purposes during examination of the application. As noted, these are background references to the general state of the art in respective areas, such as particular (but well known) encryption techniques. Such citation of well known materials was not intended as an information disclosure statement, nor should they be.

Status of the Claims

Examiner's request that line numbers for each claim begin over with line 1 have been accommodated in the claims currently presented, though this change in line numbering has not been identified as involving claim amendments.

Claims 1-20 were in the application as examined.

Claims 1-10 and 16 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,694,437 to Pao (hereinafter "Pao").

Claims 11-15 and 17-20 stand rejected under 35 U.S.C. § 103(a) as obvious over Pao as applied by Examiner to claims 1, 2, 6, 10 in light of what Examiner characterizes as "what was well known in the art" (hereafter Well-Known).

Arguments in Support of Patentability of the Claims

Rejection of Claims 1-10 and 16 under 35 U.S.C. § 102(e)

The rejection of claims 1-10 and 16 under 35 U.S.C. § 102(e) as anticipated by Pao is respectfully traversed.

Initially, it is submitted that Pao is directed to a different class of problems than the present invention, and that Pao offers solutions to those different problems than are provided by the present invention. More specifically, Pao is focused exclusively on dial up access through an ISP. His solution includes an access concentrator 31 (see FIG. 3) characterized at col. 2, lines 60-64 thus:

The Access Concentrator 31 operates on a dial access platform and can control access for dial-in circuit switched calls originating from a PSTN or ISDN 32 or to initiate outbound circuit-switched connections.

Importantly, Pao nowhere teaches receiving packets at a network interface unit from “client devices on at least one local area network (LAN).” Further, Pao nowhere teaches or suggests that the network interface unit includes “means for directly connecting to said at least one LAN.” Instead, Pao receives input over the PSTN at a dial-up platform for further processing.

One important consequence of Pao’s network-based dial-up platform for connecting to a VPN is that it is fixed, *i.e.*, not portable as is applicants’ network interface unit. Thus, a principal motivation behind applicants’ LAN-connectable network interface device is its portability. See, for example, specification at p. 1, line 29 through p. 2, line 10 and p. 26, lines 9-11. A feature of the present invention includes ready access to remote VPN over non-secure paths by connecting a network interface unit to a LAN including user devices seeking secure communications with such VPNs. Pao does not seek to achieve this goal, and he surely does not provide means or motivation to do so.

Each of the independent claims 1 and 17, as presently amended, includes specific structure that distinguishes over Pao and achieves results not obtainable by Pao’s teachings.

Thus, claim 1 (amended) recites that the network interface unit provides

a. “for communicating data packets over at least one non-secure network between client devices on at least one ... LAN and a secure ... VPN,” and

b. “means for directly connecting to said at least one LAN....”

So, applicant’s claim 1 permits portable operation of a more flexible network interface unit by including functionality in a portable device capable of being moved from one location to another where it can be appropriately connected to one or more LANs, and to one or more non-secure networks. Pao neither teaches nor suggests this approach, nor does Pao achieve applicants’ results.

Likewise, applicants’ claim 17 (amended) recites

A network interface unit for communicating data packets over at least one non-secure network between client devices on at least one local area network (LAN) and at least one security portal of a secure virtual private network (VPN) comprising

means for receiving data packets from said client devices on said at least one LAN,

means for multiplexing said data packets into at least one packet data stream for delivery to said at least one non-secure network....

It will therefore be appreciated that claim 17 provides “communication of packets between client devices on at least one ... LAN and ... a VPN.” This communication is achieved over at least one non-secure network. Further applicants’ network interface unit provides “means for receiving data packets from said client devices on said at least one LAN....” Portability is achieved by permitting the network interface device to receive packets from client devices on said at least one LAN. These features are not provided or suggested by Pao.

Further, the network interface device provides for “multiplexing said data packets into at least one packet data stream for delivery to said at least one non-secure network....” So, as shown in FIGs. 1 and 3, for example, the network interface unit performs multiplexing before delivery to the non-secure network(s). Pao provides no such functionality.

Other features of the inventions of claims 1 and 17 are apparent from a careful reading of those claims. Thus, a device having a high degree of portability can, in accordance with the recitations of claims 1 and 17 provide authentication, configuration, GUI and security functionality, among other features.

For the above reasons, it is respectfully submitted that claims 1 and 17, as presently amended, clearly are distinguishable from any teachings or suggestions presented in Pao. Accordingly, claims 1 (amended) and 17 (amended) are patentable over Pao under 35 U.S.C. § 102 (e). Since claims 2-16 depend from claim 1 and include all of the limitations of claim 1, and since claims 18-20 depend claim 17, all of claims 1-20, as presently amended are deemed patentable over Pao under 35 U.S.C. § 102 (e).

Rejection of Claims 11-15 and 17-20 under 35 U.S.C. § 103(a)

The rejection of claims 11-15 and 17-20 under 35 U.S.C. § 103(a) as obvious over Pao as applied by Examiner to claims 1, 2, 6, 10 in light of Well-Known is respectfully traversed.

As noted above, claims 11-15 and 17-20 include elements not found in Pao's differently directed structures. Pao does not teach or suggest a device recited in various embodiments in these claims that is capable of being connected to at least one LAN on which user devices are able to communicate over at least one non-secure network with a VPN. Applicants' network interface unit is not limited to dial-up, and can receive inputs from a plurality of user devices on a LAN; Pao cannot, and so-called Well Known does not affect this distinction. Pao provides no network interface unit that can be connected directly to a LAN, and he does not provide multiplexing at a network unit connected to a LAN for delivery to non-secure networks.

Moreover inclusion of so-called Well Known functionality (even if individually and separately known in the art) that is recited in various of of these claims does not change the basic differences recited in claims 1 and 17 above that are included by dependency in the dependent claims. It is respectfully submitted that none of the elements of claims 1 (amended) or 17 (amended) discussed above in distinguishing over Pao in connection with the rejection *under 35 U.S.C. § 102(e)* are taught, suggested or,

without applicants' teachings, usable in a network arrangement dealt with by Pao to render any of claims 11-15 and 17-20 obvious under 35 U.S.C. § 103(a).

References Cited But Not Applied

Applicants have considered the references cited but not applied to the claims as presently amended, and finds nothing in these references that would adversely affect the allowability of these claims.

Conclusion

For the foregoing reasons, it is respectfully submitted that claims 1-20, as presently amended, overcome or avoid all bases for rejection or objection and are allowable. It is requested that all claims be further examined, found allowable and passed to issue.

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